

Alexander James Taylor, Esq.  
**SULAIMAN LAW GROUP, LTD.**  
2500 S. Highland Ave., Ste. 200  
Lombard, IL 60148  
Telephone: (630) 575-8180  
ataylor@sulaimanlaw.com  
*Counsel for Plaintiff*

**UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA**

Janelle M. Gephart,  
Plaintiff,

v.

TD Bank, N.A., and TransUnion, LLC,  
Defendant.

Case No. 2:22-cv-01652-SMM

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO  
FILE RESPONSE TO  
DEFENDANT’S MOTION FOR  
FEES**

**NOW COMES** Janelle M. Gephart (“Plaintiff”), by and through her undersigned counsel, bringing the following Motion for Extension of Time to File her Response to Defendant TD Bank, N.A.’s (“Defendant”) Motion for Fees, and in support thereof, stating as follows:

1. On September 28, 2022, Plaintiff filed the instant case alleging violations of the Fair Credit Reporting Act (“FCRA”) pursuant to 15 U.S.C. §1681 and violations of the Bankruptcy Discharge Injunction (“Discharge Injunction”) under 11 U.S.C. §524. [Dkt. 1]
2. On October 19, 2023, the Parties filed a Stipulation of Dismissal. [Dkt. 39]
3. On November 2, 2023, Defendant filed a Motion for Attorney Fees (“Defendant’s Motion”). [Dkt. 41]

1           4. Pursuant to Local Rule 7.2(c), Plaintiff's response to Defendant's Motion is  
2 due on or before November 16, 2023.

3           5. Due to other professional deadlines and the upcoming Thanksgiving holiday,  
4 Plaintiff's counsel is respectfully requesting a 21-day extension, through December 7, 2023,  
5 to submit Plaintiff's response to Defendant's Motion.  
6

7           6. Plaintiff's counsel conferred with Defendant's counsel regarding the relief  
8 sought herein and the Defendant has no objection.  
9

10          7. This extension will not impact any other deadlines in this case.

11          8. The extension is sought in good faith and will not prejudice Defendant.

12          9. Based on the foregoing, there is good cause for the extension sought herein.  
13

14           **WHEREFORE**, Plaintiff respectfully requests that the Court enter an order (1)  
15 extending the deadline for Plaintiff to submit her response to Defendant's Motion for Fees  
16 through December 7, 2023; and (2) granting any further relief this Court deems just and  
17 proper.  
18

19 Dated: November 16, 2023

Respectfully Submitted,

20 /s/ Alexander J. Taylor

Alexander J. Taylor

21 *Counsel for Plaintiff*

Sulaiman Law Group, Ltd.

22 2500 South Highland Avenue, Suite 200

23 Lombard, Illinois 60148

24 Phone: (630) 575-8180

Fax: (630) 575-8188

25 ataylor@sulaimanlaw.com  
26  
27  
28

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Motion was electronically filed with the Clerk of the Court using the CM/ECF system on November 16, 2023, which constitutes service on counsel of record.

/s/ Alexander J. Taylor